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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Case Nos. 19-30088 (DM)

PG&E CORPORATION,

(Lead Case) (Jointly Administered)

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**PG&E'S EVIDENTIARY OBJECTIONS IN
OPPOSITION TO PARTIAL MOTION FOR
SUMMARY JUDGMENT AND IN
SUPPORT OF COUNTER-MOTION FOR
SUMMARY JUDGMENT**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

Date: May 9, 2023
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM)*

Pursuant to the Federal Rules of Evidence, Reorganized Debtors PG&E Corporation and Pacific Gas and Electric Company hereby object to the declarations and exhibits submitted in support of Claimant's Motion for Partial Summary Judgment and in opposition to Debtors' Counter-Motion for Summary Judgment:

Declaration of Amir Shahmirza in Support of Opposition to Counter-Motion for Summary Judgment by PG&E [Docket No. 13654-1]

Paragraph 3, at 2:18-21 (second ¶3), in its entirety.	FRE 602, Lacks Foundation/Personal Knowledge.
Paragraph 4, at 2:22-24, in its entirety.	FRE 602, Lacks Foundation/Personal Knowledge.
Paragraph 5, at 2:25-3:5, in its entirety.	FRE 602, Lacks Foundation/Personal Knowledge
Paragraph 11, at 4:11-13.	FRE 801, Hearsay.
Paragraphs 16-20, at 5:3-20, In their entirety.	FRE 602, Lacks Foundation/Personal Knowledge; FRE 801, Hearsay.
Paragraph 21, at 6:1-16 (photo and description.	FRE 602, Lacks Foundation/Personal Knowledge/Authentication; FRE 801, Hearsay.
Paragraph 23, at 6-19-21, in its entirety.	FRE 602, Lacks Foundation.
Paragraphs 28 and 29, at 7:5-8, in their entirety.	FRE 602, Lacks Foundation/Personal Knowledge; FRE 801, Hearsay.
Paragraph 30, lines 9-10 "within approximately two 92) months of learning of the relocation and height alteration."	FRE 602, Lacks Foundation/Personal Knowledge/Authentication; FRE 801, Hearsay.

Declaration of Lawrence A. Jacobson in Opposition to Counter-Motion for Summary Judgment by PG&E [Docket No. 13654-2] and Request for Judicial Notice [Docket No. 13654-3]

Paragraphs 2-4, at 2:4-9.	FRE 201, Insufficient Support for Judicial Notice, FRE 602, Lacks Foundation (no exhibit or reference to exhibit), FRE 801, Hearsay.
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Dated: April 19, 2023

**KELLER BENVENUTTI KIM LLP
ROVENS LAMB LLP
LAW OFFICES OF JENNIFER L. DODGE, INC.**

By: /s/ Steven A. Lamb

Steven A. Lamb

Attorneys for Debtors and Reorganized Debtors